

LATHAM & WATKINS LLP
 Matthew Rawlinson (SBN 231890)
 140 Scott Drive
 Menlo Park, California 94025
 T: (650) 328-4600 / F: (650) 463-2600
 matthew.rawlinson@lw.com

Elizabeth Deeley (SBN 230798)
 505 Montgomery Street, Suite 2000
 San Francisco, California 94111
 T: (415) 391-0600 / F: (415) 395-8095
 elizabeth.deeley@lw.com

Andrew B. Clubok (*pro hac vice*)
 Susan E. Engel (*pro hac vice*)
 555 Eleventh Street, NW, Suite 1000
 Washington, D.C. 20004
 T: (202) 637-2200 / F: (202) 637-2201
 andrew.clubok@lw.com
 susan.engel@lw.com

Colleen C. Smith (SBN 231216)
 12670 High Bluff Drive
 San Diego, California 92130
 T: (858) 523-5400 / F: (858) 523-5450
 colleen.smith@lw.com

*Attorneys for Defendants Lyft, Inc., Logan Green,
 John Zimmer, Brian Roberts, Prashant (Sean)
 Aggarwal, Jonathan Christodoro, Ben Horowitz,
 Valerie Jarrett, David Lawee, Hiroshi Mikitani, Ann
 Miura-Ko, and Mary Agnes (Maggie) Wilderotter*

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

In re LYFT, INC. SECURITIES
 LITIGATION

Master File No. 4:19-cv-02690-HSG

This Document Relates to:
 ALL ACTIONS

CLASS ACTION

**JOINT STIPULATION AND
 ORDER TO EXTEND BRIEFING
 SCHEDULE ON PLAINTIFF'S
 MOTION FOR CLASS
 CERTIFICATION**

Pursuant to Local Rules 6-2 and 7-12, Defendants Lyft, Inc., Logan Green, John Zimmer, Brian Roberts, Prashant (Sean) Aggarwal, Jonathan Christodoro, Ben Horowitz, Valerie Jarrett, David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes Wilderotter (the “Lyft Defendants”) and Lead Plaintiff, Rick Keiner (“Plaintiff”, and together with the Lyft Defendants, the “Parties”), through their counsel, submit the following Joint Stipulation and [Proposed] Order To Extend Briefing Schedule on Plaintiff’s Motion for Class Certification.

WHEREAS, on March 26, 2020, the Court issued a Scheduling Order setting a briefing schedule for Plaintiff’s amended complaint and Defendants’ motion to dismiss per the Parties’ joint proposal (ECF No. 72);

WHEREAS, on April 16, 2020, pursuant to the Scheduling Order, Plaintiff filed the Consolidated Amended Class Action Complaint for Violation of the Federal Securities Laws (the “Complaint”) (ECF No. 74);

WHEREAS, on May 17, 2020, pursuant to the Scheduling Order, the Lyft Defendants filed their Motion to Dismiss the Complaint (ECF No. 78);

WHEREAS, on June 11, 2020, pursuant to the Scheduling Order, Plaintiff filed his opposition to the Lyft Defendants’ Motion to Dismiss the Complaint (ECF No. 84);

WHEREAS, on June 24, 2020, the Court granted the Parties’ Joint Stipulation to Extend the Briefing Schedule On Lyft Defendants’ Motion to Dismiss (the “Briefing Extension Order”) (ECF. No. 87);

WHEREAS, pursuant to the Briefing Extension Order, the Lyft Defendants filed their Reply in Support of Motion to Dismiss the Complaint on July 9, 2020 (ECF. No. 88);

WHEREAS, on September 8, 2020, the Court issued its Order Granting In Part and Denying in Part Defendants’ Motion to Dismiss (ECF No. 96);

WHEREAS, on September 25, 2020, Plaintiff filed his Motion for Class Certification (ECF No. 98);

WHEREAS, the Lyft Defendants’ Opposition to the Motion for Class Certification (the “Opposition”) is currently due to be filed on October 9, 2020;

WHEREAS, to accommodate for the press of business and ensure adequate time for

1 briefing, counsel for the Parties have met and conferred, and agree to extend the date for the
2 Opposition from October 9, 2020 to January 12, 2021; the date for Plaintiff's Reply from
3 October 16, 2020 to January 22, 2021; and the hearing currently set for December 17, 2020 at
4 2:00 p.m. shall be set for February 4, 2021 at 2:00 p.m., or a date otherwise set by the Court.

5 WHEREAS, this extension of time will not alter the date of any event or deadline already
6 fixed by Court order;

7 WHEREAS, this stipulation is not intended to operate as an admission of any factual
8 allegation or legal conclusion and is submitted subject to and without waiver of any right,
9 defense, affirmative defense, or objection;

10 NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate,
11 subject to Court approval, that the briefing schedule for the Motion for Class Certification will be
12 modified as follows:

13 1. The Lyft Defendants shall file their Opposition to the Motion for Class
14 Certification by January 12, 2021.

15 2. Plaintiff shall file a Reply in support of his Motion for Class Certification by
16 January 22, 2021.

17 3. The noticed date for a hearing on the Motion for Class Certification shall be set
18 for February 4, 2021 at 2:00 p.m., or a date otherwise set by the Court.

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20 Stipulated and agreed to by:

21 Date: October 8, 2020
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BLOCK & LEVITON LLP

/s/ Jacob A. Walker

Jacob A. Walker (CA Bar. No. 271217)
260 Franklin Street, Suite 1860
Boston, MA 02110
jake@blockesq.com

Lead Counsel and Counsel for Plaintiff

LATHAM & WATKINS LLP

/s/ Colleen C. Smith

Colleen C. Smith (CA Bar. No. 231216)
12670 High Bluff Drive
San Diego, CA 92130
Colleen.Smith@lw.com

Matthew Rawlinson (CA Bar. No. 231890)
140 Scott Drive
Menlo Park, CA 94025
T: (650) 328-4600 / F: (650) 463-2600
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Elizabeth Deeley (CA Bar. No. 230798)
505 Montgomery Street, Suite 2000
San Francisco, CA 94111
T: (415) 391-0600 / F: (415) 395-8095
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*Counsel for Defendants Lyft, Inc., Logan
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Jarrett, David Lawee, Hiroshi Mikitani,
Ann Miura-Ko, and Mary Agnes
Wilderotter*

FILER'S ATTESTATION

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of the document has been obtained from all of the signatories above.

Dated: October 8, 2020

/s/ Colleen C. Smith
Colleen C. Smith

* * *

PURSUANT TO STIPULATION, IT IS SO ORDERED except the noticed date for a hearing on the Motion for Class Certification shall be set for February 18, 2021 at 2:00 p.m.

Date: 10/13/2020


HONORABLE HAYWOOD S. GILLIAM, JR.
U.S. DISTRICT JUDGE